

# EXHIBIT K

Delphi v. DPH

**WEINSTEIN TIPPETTS & LITTLE LLP**

7660 Woodway, Suite 500  
Houston, TX 77063

Ph: (713) 244-0800

Fax: (713) 244-0801

Mr. James G. Derian

July 11, 2011

Delphi Corporation

5825 Delphi Drive, M/C 483-400-554

Troy, MI

48098-2815

File #: 2012

ATTN: Mr. James G. Derian

Inv #: 2653

RE: Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,  
et al.

**FOR PROFESSIONAL SERVICES RENDERED**

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Jun-02-11	Draft detailed letter to plaintiffs' counsel concerning bankruptcy bar and seeking consensual dismissal of lawsuit.	0.70	236.25	KRW
Jun-03-11	Meeting with attorney K. Worley to review draft letter to plaintiffs' counsel regarding dismissal due to bankruptcy issues. Memo to plaintiffs' counsel regarding same. Review and respond to plaintiffs' memo regarding discussing same 6/6/11. Client memo regarding plaintiffs' counsel reference to K. Smith counsel contact and victory on bankruptcy issue. Review and respond to J. Derian memo [REDACTED]	0.80	270.00	DBW
	Receipt and review of correspondence from J. Derian concerning subpoena to GM from plaintiffs; return correspondence concerning status of same; conference with D. Weinstein concerning drafting motion to dismiss due to bankruptcy bar; draft detailed motion to dismiss plaintiffs' claims due to disallowance by bankruptcy court.	2.40	810.00	KRW

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Jun-06-11	Meeting with attorney K. Worley to discuss revisions to letter and motions to plaintiffs' counsel in light of recent strategic discussions with client regarding plaintiffs' counsel's failure to reply to client's objection to admin claim.	0.20	67.50	DBW
	Conduct extensive revisions to motion to dismiss plaintiffs' claims due to bankruptcy bar and supporting affidavit of D. Uhrue; conduct extensive revisions to correspondence to plaintiffs' counsel seeking consensual dismissal due to bankruptcy bar, finalize motion to dismiss, supporting affidavit, and correspondence seeking consensual dismissal; multiple memos to D. Weinstein concerning all above.	3.00	1,012.50	KRW
Jun-07-11	Counsel memo regarding resetting GM deposition for June 17.	0.10	33.75	DBW
	Multiple memos from D. Weinstein concerning deposition of GM corporate representative on 6/17; return memos concerning same; memo to J. Derian concerning status of subpoena by plaintiffs to depose GM representative; correspondence to counsel for Enterprise concerning deposition of GM representative.	0.40	135.00	KRW
Jun-08-11	Staff memos regarding GM deposition and client impact regarding PODs documents.	0.10	33.75	DBW
	Review plaintiffs' revised notice of GM corporate representative deposition. File notes regarding topics.	0.10	33.75	DBW
	Correspondence to counsel for Enterprise concerning receipt of subpoena for deposition of corporate representative on 6/17 and further handling; draft memo to file concerning plaintiffs' request for deposition of former Delphi engineer J. Jackson and subsequent conference with J. Jackson.	0.60	202.50	KRW
Jun-09-11	Review and revise letter to plaintiffs' counsel, client's motion to dismiss and D. Uhrue affidavit regarding bankruptcy dismissal and claim bar. Memos with attorney K. Worley regarding next steps regarding finalizing same.	0.50	168.75	DBW

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	Memo to D. Weinstein concerning conference with counsel for GM discussing deposition of GM corporate representative and vehicle inspection on 6/22.	0.20	67.50	KRW
Jun-10-11	Meeting with J. Derian to discuss status and needed review of draft correspondence to plaintiffs' counsel and draft motion to dismiss and verification of D. Unrue affidavit. Conference with attorney K. Worley regarding same.	0.20	67.50	DBW
	Review/revise draft motion to dismiss due to bankruptcy bar and supporting affidavit of D. Unrue, and letter seeking consensual dismissal; review subpoena for deposition GM representative to prepare for conference with counsel for GM and Enterprise concerning same; conference with counsel for GM concerning 6/22 inspection and deposition of GM representative; memo to D. Weinstein concerning same; receipt and review of color police photos from counsel for Enterprise.	1.50	506.25	KRW
Jun-11-11	Review and respond to attorney K. Worley memo regarding conference with GM counsel regarding cancellation of GM corporate representative deposition and regarding 6/22/11 GM inspection of vehicle and request for Delphi support.	0.20	67.50	DBW
	Review court's scheduling order and note upcoming deadlines. Staff memos regarding same.	0.20	67.50	DBW
Jun-13-11	Conference with attorney K. Worley regarding plaintiffs' threat to file motion to compel if Delphi doesn't produce documents and regarding client's approval of sending letter and draft dismissal motion to plaintiffs' counsel and regarding client's approval of Delphi attendance with WTL counsel at planned 6/22/11 vehicle inspection.	0.30	101.25	DBW
	Receipt and review of memo from plaintiffs' counsel concerning threatened motion to compel on multiple discovery responses; memo to D. Weinstein concerning same; conference with counsel for plaintiffs concerning same; memo to D. Weinstein	0.50	168.75	KRW

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concerning conference with plaintiffs and further handling.

Jun-14-11	Review and respond to attorney Worley memos regarding 6/22/11 vehicle inspection, plaintiffs' threatened motion to compel, and strategy regarding motion for dismissal.	0.20	67.50	DBW
	Review discovery requests from plaintiffs first, second, and third sets of discovery to Delphi to determine future strategy for supplemental responses as requested by plaintiffs' counsel; conference with local counsel concerning response timeline for potential motion to compel; draft detailed file memo concerning strategy for supplementing discovery to address complaints plaintiffs make related to Delphi's discovery responses; determine future strategy for responding to plaintiffs' discovery complaints; conference with A. Curtis concerning availability for inspection of vehicle on 6/22; memo to J. Derian concerning same; detailed memo to J. Derian concerning plaintiffs' threatened motion to compel; conference with F. Peterson concerning responding to plaintiffs' threatened motion to compel.	3.00	1,012.50	KRW
Jun-15-11	Review GM counsel memo regarding canceling 6/17 deposition and seeking agreement to extend all expert disclosure deadlines by 60 days. Memo to attorney K. Worley regarding same.	0.10	33.75	DBW
Jun-16-11	Meeting with J. Derian to review bankruptcy dismissal issues, 6/22/11 vehicle inspection issues and plaintiffs' motion to compel. Conference with attorney K. Worley and J. Derian regarding same.	0.30	101.25	DBW
	Memos to D. Weinstein concerning conference with J. Derian to discuss case status and further handling; correspondence to all counsel concerning agreement to extend expert deadlines; memo from counsel for plaintiffs concerning Delphi's discovery responses; return memo concerning same; conference with J. Derian and D. Weinstein concerning motion to dismiss, plaintiffs' threatened	0.70	236.25	KRW

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motion to compel, and attending inspection of the subject vehicle.

Jun-17-11	Memo to plaintiffs' counsel coordinating conference to discuss discovery issues; prepare for conference with counsel for plaintiffs to discuss discovery complaints; draft follow up correspondence to counsel for plaintiffs concerning agreements made related to plaintiffs discovery complaints; memo to D. Weinstein concerning same; determine status of documents prepared for production in response to plaintiffs' third set of document requests; conference with D. Weinstein concerning revisions to correspondence to plaintiffs related to plaintiffs' discovery complaints; review/revise correspondence to plaintiffs; coordinate sending letter to counsel for plaintiffs; conference with A. Curtis concerning whether additional documents could be searched for in response to plaintiffs' discovery complaints; determine further handling, strategy, and future action items; memo to D. Weinstein concerning strategy and future action items.	4.50	1,518.75	KRW
Jun-19-11	Draft detailed and lengthy file memo concerning potential supplemental discovery responses; in-depth review of voluminous validation and verification testing documents prepared by A. Curtis in response to plaintiffs' first requests for production No. 59 for use in determining strategy for producing to plaintiffs; detailed memo to A. Curtis concerning issues identified with document production and further handling; memo to D. Weinstein concerning strategy for response to plaintiffs' discovery complaints; memo to J. Derian concerning future action items and finalizing response to plaintiffs' discovery complaints; memo to D. Weinstein concerning vehicle inspection on 6/22.	3.00	1,012.50	KRW
Jun-20-11	Conference with A. Curtis concerning supplemental responses to plaintiffs' discovery requests; detailed memo to D. Weinstein concerning production of verification and validation data; receipt and review of memo from D. Weinstein concerning same; preparation of documents for production;	3.70	1,248.75	KRW

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conference with D. Weinstein concerning same; conference with A. Curtis concerning same; conference with B. Frantangelo concerning same; memo to J. Derian concerning all above; memo to counsel for plaintiffs concerning production of Delphi documents; memo to J. Derian concerning document production; memo from J. Derian concerning same; conference with D. Nunan concerning attending 6/22 vehicle inspection; conference with P. McDaniel concerning same; memo to D. Weinstein concerning vehicle inspection; memo to counsel for Enterprise concerning vehicle inspection; draft memo to J. Derian concerning supplemental discovery responses.

Conference with attorney K. Worley regarding attendance at vehicle inspection, status of discovery, plaintiffs' defect theory, and discussions with Delphi engineer, D. Nunan, regarding availability of PODS equipment for analysis.	0.50	168.75	PRM
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Jun-21-11	Memos with attorney K. Worley regarding vehicle inspection and document production updates.	0.10	33.75	DBW
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Review numerous memos from attorney K. Worley regarding client's supplemental document production and discussions with plaintiffs' counsel regarding same. Lengthy strategy conference with attorney K. Worley regarding same. File notes regarding same.	0.80	270.00	DBW
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Correspondence from D. Nunan concerning 6/22 vehicle inspection; conference with J. Derian concerning 6/22 vehicle inspection; memo from J. Derian concerning 6/22 vehicle inspection; memo to counsel for Enterprise concerning attending 6/22 vehicle inspection; correspondence to A. Curtis concerning production of validation and verification testing; receipt and review of memo from counsel for Enterprise concerning change in address for vehicle inspection; memo to D. Nunan and P. McDaniel concerning same; lengthy conference with A. Curtis concerning production of documents included in validation testing folder; receipt and review	3.30	1,113.75	KRW
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memo concerning same; detailed memo to B. Frantangelo concerning documents to remove from document production and re-numbering documents; review additional documents to be produced; draft correspondence to plaintiffs' counsel concerning Delphi's supplemental discovery responses; conference with P. McDaniel concerning vehicle inspection on 6/22; memo from D. Weinstein concerning re-numbering document production following removal of certain documents; memo to J. Derian concerning same; conference with D. Weinstein concerning supplemental responses to plaintiffs' discovery requests.

Prepare for upcoming vehicle inspection by reviewing color photographs of subject vehicle; prepare memo to D. Nunan regarding attendance at upcoming vehicle inspection.	0.30	101.25	PRM
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Jun-22-11

Review staff memos summarizing interrogatory responses of plaintiffs. Staff memo regarding follow-ups from same.	0.30	101.25	DBW
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Staff memos regarding strategy for ordering most relevant medical records and seeking cost sharing of same with co-defendants.	0.10	33.75	DBW
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Receipt and review of correspondence from B. Frantangelo concerning preparation of documents responsive to plaintiffs' third requests for production; receipt and review of correspondence from counsel for GM concerning production of GM verification documents; conference with B. Frantangelo concerning re-numbering GM verification documents; draft memo to J. Derian concerning Delphi's responses to plaintiffs' interrogatories No. 22 and 25; draft detailed correspondence to counsel for plaintiffs concerning agreements on discovery disputes; determine strategy for and draft individual responses to each of plaintiffs twelve requests for supplementation; memo to D. Weinstein sending draft correspondence.	2.40	810.00	KRW
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Continue preparation for vehicle inspection, including review of accident report and discovery responses; attend vehicle inspection and conference with D. Nunan and counsel and	6.00	2,025.00	PRM
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experts for Enterprise RAC Company of Maryland, LLC, Rockmont Motor Company, and General Motors; prepare notes of observations during vehicle inspection.

Receipt and review memo from D. Weinstein regarding status of deposition transcript summaries; review file for transcripts received vs. summaries prepared; memo to D. Weinstein and K. Worley detailing list of summaries still needed. 0.10 11.70 MPP

Jun-23-11 Review and revise draft letter to plaintiffs' counsel regarding discovery dispute status. Memo to attorney K. Worley regarding same. review attorney P. McDaniel memo regarding results of recent vehicle inspection. 0.30 101.25 DBW

Receipt and review of memo from D. Weinstein concerning issues with production of validation and verification documents; receipt and review of CD of documents from B. Frantangelo; conduct in-depth review of CD of documents sent by Delphi to determine particular requests the documents respond to for use in drafting correspondence to plaintiffs sending documents; draft detailed correspondence to counsel for plaintiffs sending Delphi documents; draft detailed memo to J. Derian seeking approval for correspondence to plaintiffs related to Delphi's supplemental discovery responses; office conference with F. Peterson concerning plaintiffs' threatened motion to compel and strategy for potential response; conference with J. Derian concerning Delphi's supplemental discovery responses. 3.50 1,181.25 KRW

Conference with attorney K. Worley regarding observations at vehicle inspection; prepare memo to attorney D. Weinstein regarding discussions at vehicle inspection and preparation of protocol for removal of SDM. 0.20 67.50 PRM

Prepare documents to produce in response to plaintiffs' third request for production. 0.50 58.50 MPP

Jun-24-11 Conference with J. Derian concerning finalizing letter to plaintiffs regarding Delphi's discovery responses; review/revise/finalize 1.00 337.50 KRW

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correspondence to plaintiffs' counsel concerning supplemental discovery responses; coordinate sending correspondence to plaintiffs; detailed memo to F. Peterson concerning supplemental discovery responses and future action items.

Jun-27-11	Review plaintiffs' memo to all counsel regarding EDR downloading. Memo to D. Nunan regarding thoughts on same.	0.10	33.75	DBW
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Jun-28-11	Review and respond to plaintiffs' counsel memo regarding arranging Mrs. Averbukh deposition 8/15-16/11. Review and respond to D. Nunan memo with thoughts on recent counsel memos regarding difficulty of downloading subject SDM.	0.30	101.25	DBW
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	Receipt and review of memo from plaintiffs' counsel regarding removal of SDM from subject vehicle and download of information; review and respond to memos from attorney D. Weinstein and D. Nunan regarding protocol for removal of SDM and download of information.	0.30	101.25	PRM
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Unadjusted Balance (UB)	47.60	\$15,932.70
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Balance Due (90% of UB per agreement) *	\$14,339.43
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\*Amount claimed in Motion does not reflect adjustment because 10% difference was paid on later invoice.

**DISBURSEMENTS**

Jun-07-11	Certified copy of transcript and word index provided by Legalink, Inc. - certified copy of transcript and word index of J. DeRose	110.00
Jun-20-11	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Hotel	145.77
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Rental Car	138.06
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Gas for Rental Car	10.76
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Lunch at Airport	18.89
	P. McDaniel travel to Baltimore for vehicle inspection in Annapolis, MD - Airfare	927.90

Totals	\$1,351.38
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**Total Fee & Disbursements**

**\$15,690.81**

Total amount claimed in Motion after disregarding 10% adjustment:

TAX ID Number 26-2022982

\$17,284.08

Mr. James G. Derian

Name	TIMEKEEPER SUMMARY	Hours	Rate	Amount
David B. Weinstein		5.30	\$337.50	\$1,788.75
Katheryne Worley		34.40	\$337.50	\$11,610.00
Philip McDaniel		7.30	\$337.50	\$2,463.75
Maggie Peroni		0.60	\$117.00	\$70.20

Sedgwick  
DPH

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Houston, TX 77063

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Mr. James G. Derian

August 8, 2011

Delphi Corporation

5825 Delphi Drive, M/C 483-400-554

Troy, MI

48098-2815

File #: 2012

ATTN: Mr. James G. Derian

Inv #: 2707

RE: Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,  
et al.

**FOR PROFESSIONAL SERVICES RENDERED**

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Jul-08-11	Review plaintiffs' memo requesting A. Curtis deposition in mid-August. File review regarding status of deposition requests. Memo back regarding same. Memo to attorney K. Worley regarding same.	0.20	67.50	DBW
Jul-12-11	Receipt and review of memo from D. Weinstein concerning future action items following plaintiffs' request for deposition of A. Curtis.	0.20	67.50	KRW
Jul-13-11	Meeting with attorney K. Worley to review status of plaintiffs' request for deposition of A. Curtis and open issues regarding dismissal motion and possible settlement overture. Conference with J. Derian regarding same.	0.40	135.00	DBW
	Conference with A. Curtis concerning deposition requested by plaintiffs' counsel; conference with D. Weinstein concerning case status and further handling, plaintiffs' request for deposition of A. Curtis, and future action items; conference with D. Weinstein and J. Derian concerning future action items; memo to D. Weinstein concerning scheduling	1.90	641.25	KRW

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deposition of A. Curtis and agreement to provide deposition dates to plaintiff.

Jul-14-11

Memos with local counsel and attorney K. Worley regarding plaintiffs' attorney first appearance as relevant to motion to dismiss.

0.10

33.75

DBW

Review A. Curtis memos regarding deposition availability end of August 2011. Memos with staff and attorney K. Worley regarding same. Review plaintiffs' filing notice of additional "local local" counsel.

0.30

101.25

DBW

Conference with J. Derian concerning timing of plaintiffs' attorneys pro hac vice and other items; locate information on first contact with Kuhlman law firm; receipt and review of correspondence from A. Curtis concerning scheduling deposition; memo to plaintiffs' counsel concerning same; memo from J. Derian concerning obtaining probate records; conduct on-line search for probate records of plaintiffs; review plaintiffs' discovery responses to locate probate records; memo to J. Derian concerning same; memo to D. Weinstein concerning plaintiff A. Averbukh's attorneys; memo from J. Derian concerning same; memo to local counsel concerning obtaining probate documents; memo to J. Derian concerning same.

1.60

540.00

KRW

Jul-15-11

Client and staff memo regarding strategy in light of plaintiffs' request for data on inadvertent airbag deployments. Review co-defendants' notice of deposition of plaintiff/defendant A. Averbukh. Memos with attorney K. Worley regarding same.

0.20

67.50

DBW

Conference with G. Greib concerning plaintiffs' discovery request seeking information on field incidents in inadvertent deployments; memo to G. Greib concerning same; return memo from J. Derian concerning same; memo to J. Derian concerning strategy for responding to plaintiffs' discovery requests; receipt and review of notice of deposition of Mrs. A. Averbukh; review multiple memos from all counsel concerning same; determine future action items for providing supplemental responses to plaintiffs'

1.50

506.25

KRW

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discovery requests; conference with J. Derian concerning case status and future action items; memo to D. Weinstein concerning same.

Jul-18-11	Receipt and review of memo from D. Weinstein concerning retention of counsel by plaintiff A. Averbukh; memo to D. Weinstein concerning same; memo to J. Derian concerning retention of attorneys by A. Averbukh; memo to D. Weinstein concerning attending deposition of plaintiff A. Averbukh on 8/15; memo from D. Weinstein concerning scheduling deposition of Delphi representative; return memo concerning same; memo from J. Derian concerning deposition of A. Averbukh; draft supplemental responses to plaintiffs' first interrogatories; draft supplemental responses to plaintiffs' first requests for production; draft supplemental responses to plaintiffs' second requests for production.	3.00	1,012.50	KRW
Jul-19-11	Review notice of A. Averbukh deposition. Memo to counsel regarding arrangements for same. Numerous client, counsel and staff memos regarding deposing Andy Curtis 9/27.	0.30	101.25	DBW
Jul-20-11	Review and respond to J. Derian memo regarding place to present A. Curtis for deposition. Further memos regarding same.	0.20	67.50	DBW
Jul-21-11	Review probate file and local counsel memo regarding same. Memos with attorney K. Worley regarding follow-up to same and regarding status of supplemental discovery responses.	0.20	67.50	DBW
Jul-22-11	Review plaintiffs' fourth request for production set to client. Memos with attorney K. Worley regarding same.	0.10	33.75	DBW
	Conference with A. Curtis concerning Delphi's supplemental discovery responses to plaintiffs' first interrogatories, first requests for production, and second requests for production; conference with counsel for plaintiffs concerning due date for supplemental discovery responses; memo to J. Derian concerning status of supplemental discovery responses; receipt and review of plaintiffs'	1.40	472.50	KRW

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	fourth requests for production to Delphi; memo to A. Curtis and J. Derian sending additional discovery requests and coordinating conference to discuss potential objections and identify potentially responsive documents.			
Jul-24-11	Draft verification for A. Curtis's signature for first supplemental interrogatories.	0.30	101.25	KRW
Jul-25-11	Draft correspondence to counsel for GM concerning confidentiality agreement prior to document production; memo to J. Derian sending correspondence for review and approval.	0.80	270.00	KRW
Jul-26-11	Review and revise client's draft supplemental responses to plaintiffs' interrogatories.	0.30	101.25	DBW
	Memos with attorney K. Worley regarding attendance at GM corporate representative deposition 8/31/11.	0.10	33.75	DBW
	Conference with J. Derian concerning obtaining approval of supplemental interrogatory responses; receipt and review of correspondence from J. Derian concerning supplemental discovery responses, new discovery requests, and additional future action items.	0.50	168.75	KRW
Jul-27-11	Review/revise/finalize supplemental responses to requests for production and interrogatories; memo from J. Derian concerning production of provision of MDA related to records retention; review/revise discovery response to reflect generally provisions of MDA; memo to J. Derian concerning same; return memo approving language for response to interrogatory No. 25.	2.10	708.75	KRW
Jul-28-11	Prepare for conference with J. Derian and A. Curtis concerning responses to discovery requests; lengthy conference with J. Derian and A. Curtis to discuss plaintiffs' fourth requests for production, potential objections, and potentially responsive documents.	1.70	573.75	KRW

Unadjusted Balance (UB) 17.40 \$5,872.50

Balance Due (90% of UB per agreement) \* \$5,285.25

\*Amount claimed in Motion does not reflect adjustment because 10% difference was paid on later invoice.

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**DISBURSEMENTS**

Jul-01-11	FedEx delivery 06/24/11 to B. Kuhlman with The Kuhlman Law Firm	29.35
Jul-06-11	Professional services rendered by Bacon, Thornton & Palmer, L.L.P.	30.00
<b>Totals</b>		<b>\$59.35</b>

**Total Fee & Disbursements**

**\$5,344.60**

Total amount claimed in Motion after disregarding 10% adjustment  
TAX ID Number 26-2022982 and subtracting \$30 Bacon invoice: \$5,901.85  
Mr. James G. Derian

<b>Name</b>	<b>TIMEKEEPER SUMMARY</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
David B. Weinstein		2.40	\$337.50	\$810.00
Katheryne Worley		15.00	\$337.50	\$5,062.50



Sedgwick  
CPH

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Mr. James G. Derian

September 12, 2011

Delphi Corporation

5825 Delphi Drive, M/C 483-400-554

Troy, MI

48098-2815

File #: 2012

ATTN: Mr. James G. Derian

Inv #: 2718

RE: Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,  
et al.

**FOR PROFESSIONAL SERVICES RENDERED**

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Aug-02-11	Conference with counsel for Enterprise/GM concerning deposition of GM representative, Alla Averbukh, production of Delphi documents, and strategy for filing motion for non-sharing protective order; conduct initial legal research for motion for non-sharing protective order.	0.80	270.00	KRW
Aug-03-11	Review and respond to attorney K. Worley memo regarding status of drafting protective order and running past local counsel first.	0.10	33.75	DBW
	Receipt and review of memo from A. Curtis concerning searching for documents in response to plaintiffs' 4th requests for production; draft return memo concerning same; conduct in-depth legal research to locate Maryland law on permissibility of non-sharing protective orders; review Maryland Rule of Civil Procedure 2-403 and case annotations to same for use in drafting motion for entry of non-sharing protective order; draft motion for non-sharing protective order; memo to D. Weinstein concerning all above.	3.50	1,181.25	KRW
Aug-05-11	Review/respond to attorney K. Worley memo	0.20	67.50	DBW

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regarding EDR download request from plaintiffs' counsel and protocol for same. Memos with attorney K. Worley regarding protective order provisions and strategy for filing same.

Conference with counsel for GM/Enterprise concerning plaintiff's proposed EDR download and future action items; memo exchange with D. Weinstein and coordination concerning above.

0.40

135.00

KRW

Aug-08-11

Memos with defense counsel and attorney K. Worley regarding arrangements for plaintiff A. Averbukh's 8/15/11 deposition.

0.10

33.75

DBW

Review numerous cases cited in motion for non-sharing protective order to confirm citations and prepare for filing with the court; conference with counsel for plaintiffs concerning issues in dispute for use in finalizing motion for non-sharing protective order; memo to D. Weinstein concerning finalizing for filing motion for non-sharing protective order; return memo concerning all above; memo to F. Peterson concerning motion for non-sharing protective order.

2.20

742.50

KRW

Aug-09-11

Complete review of legal authority cited in motion for non-sharing protective order; review/revise/finalize motion for non-sharing protective order; memo from F. Peterson concerning same; memo to D. Weinstein concerning same; memo to J. Derian sending motion for non-sharing protective order for review and approval.

1.90

641.25

KRW

Aug-10-11

Memos with attorney K. Worley regarding status of client's proposed protective order.

0.10

33.75

DBW

Receipt and review of correspondence from J. Derian concerning revisions to motion for non-sharing protective order; review/revise motion for non-sharing protective order; review/revise protective order to be entered by the Court; correspondence to counsel for Enterprise/GM concerning proposed motion for entry of non-sharing protective order; memo to J. Derian concerning finalizing and filing motion for non-sharing protective order.

1.10

371.25

KRW

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Aug-11-11	Memo to counsel for GM/Enterprise sending motion for non-sharing protective order; memo exchange concerning finalizing and filing motion with counsel for GM/Enterprise; review end of line test data sent by A. Curtis for use in determining production; confirm due date for responses to plaintiffs' fourth requests for production; memo to D. Weinstein concerning same; memo to J. Derian concerning production of end of line test data documents located by A. Curtis.	0.80	270.00 KRW
Aug-12-11	Conduct in-depth review of file and determine materials needed to prepare for deposition of use plaintiff/defendant and driver of subject vehicle Alla Averbukh in Baltimore, MD on August 15; coordination, conferences, and memos concerning preparation of numerous file materials including police records, medical examiner records, deposition transcripts, and photos for deposition of Alla Averbukh; analysis of potential areas of questioning of Alla Averbukh; memo to counsel for GM/Enterprise concerning Delphi's motion for non-sharing protective order; memo to D. Weinstein concerning finalizing and filing motion for non-sharing protective order.	2.90	978.75 KRW
	Compile documents produced by Delphi; draft letter and forward to Enterprise/GM.	1.30	152.10 MPP
Aug-14-11	Draft responses and objections to plaintiffs 4th requests for production; review/revise draft responses; send draft responses to Andy Curtis and Jim Derian; review police report, plaintiffs' responses to discovery, pleadings, and additional file materials to prepare questioning for deposition of Alla Averbukh; draft outline of deposition questioning for plaintiff/defendant Alla Averbukh.	3.00	1,012.50 KRW
Aug-15-11	Review deposition testimony of first responders Quintina Walker, Suzanna Fitzpatrick, Eboni Robinson, Thomas Potter, and scene witness Leonard Prather for use in preparing for deposition of Alla Averbukh; conduct final preparations for deposition of Alla Averbukh in Baltimore Maryland including additional review of file materials including medical examiner report, police	4.00	1,350.00 KRW

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report, EMS records, and additional materials and review/revisions to draft deposition outline.

Attend deposition of Alla Averbukh; conferences with counsel concerning case status and future action items; conferences with counsel for co-Defendants GM and Enterprise concerning further handling.	6.00	2,025.00	KRW
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Assist attorney K. Worley in identifying Maryland legal standards for apportionment of fault and calculation of damages.	0.20	23.40	MPP
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Aug-16-11 Meeting with attorney K. Worley to review Alla Averbukh deposition 8/15/11 and discuss strategy in light of same.	0.50	168.75	DBW
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Follow-up memos with attorney K. Worley regarding protective order motion issues.	0.10	33.75	DBW
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Conference with D. Weinstein concerning deposition of Alla Averbukh, case status, further handling, and future action items; receipt and review of correspondence from A. Curtis concerning status of discovery responses; receipt and review of correspondence from J. Derian concerning discovery responses; return correspondence concerning same; review/revise/finalize motion for non-sharing protective order; memo to local counsel concerning same; memo exchange coordinating filing of motion; memo to A. Curtis concerning responses to 4th requests for production.	1.70	573.75	KRW
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Aug-17-11 Review attorney K. Worley client report on A. Averbukh deposition. Memo to attorney K. Worley regarding follow-ups.	0.10	33.75	DBW
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Draft summary of deposition of Alla Averbukh; memo to J. Derian concerning same; conference with A. Curtis concerning Delphi's responses to plaintiffs' third request for productions and production of documents in response; receipt and review of memo from J. Derian concerning deposition of Alla Averbukh; memo to D. Weinstein concerning discussing potential early resolution of lawsuit.	2.20	742.50	KRW
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Date	Description	Hours	Amount	Attorney
Aug-18-11	Receipt and review of file-stamped motion for non-sharing protective order; memo to J. Derian concerning proposed EDR download stipulation proposed by plaintiffs; review/revise draft responses to plaintiffs' third requests for production; memo to A. Curtis concerning same; memo to local counsel concerning setting motion for non-sharing protective order for hearing; memo to local counsel concerning application of non-economic damages cap under Maryland law and future action items; receipt and review of correspondence from A. Curtis concerning revisions to discovery responses; return correspondence concerning same; conference with A. Curtis concerning same; conference with local counsel concerning non-economic damages cap and issues related to settlement; receipt and review of correspondence from local counsel concerning calculation of non-economic damages cap and future action items; return memo concerning same.	2.30	776.25	KRW
Aug-19-11	Memos with attorney K. Worley [REDACTED] [REDACTED] Review local counsel memo outlining [REDACTED] [REDACTED] File notes regarding same.	0.30	101.25	DBW
	Correspondence to counsel for GM/Enterprise [REDACTED] [REDACTED] responses to plaintiffs' fourth requests for production to include Bates numbers of documents previously produced; review previous discovery responses to determine appropriate Bates numbers for documents; memo from D. Weinstein [REDACTED] [REDACTED] memo to J. Derian [REDACTED] [REDACTED]	1.00	337.50	KRW
Aug-22-11	Review file in preparation for conference call with client, attorney K. Worley and Butzel Long partner C. Haffey regarding bankruptcy dismissal motion issues, SDM/EDR download issues and contacting plaintiffs' attorney regarding [REDACTED] Conference call regarding same. Post-conference meeting with attorney K. Worley regarding same.	1.00	337.50	DBW

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September 12, 2011

Memo to plaintiffs' attorney [REDACTED]  
[REDACTED]

Conference with plaintiffs' attorney Kuhlmann 0.40 135.00 DBW  
[REDACTED] Report to  
client regarding same.

Prepare for conference with J. Derian and D. 4.40 1,485.00 KRW  
Weinstein concerning case status and future  
action items; conference with J. Derian and D.  
Weinstein [REDACTED]

plaintiffs' proposed stipulation concerning the  
EDR download, and possibility of deposing  
medical examiner; conference with court  
reporting firm from deposition of A. Averbukh  
for use in obtaining rough draft of deposition  
transcript; correspondence to court reporter  
sending photo of A. Averbukh, exhibit 1, for  
attachment to deposition of A. Averbukh;  
review/revise/finalize responses to plaintiffs'  
fourth requests for production; memos and  
coordinating concerning service of responses  
to plaintiffs' fourth requests for production on  
plaintiffs; conference with A. Curtis  
concerning same.

Aug-23-11 Review and respond to client memo regarding 0.20 67.50 DBW  
sending K. Smith order to attorney C. Haffey.  
Review plaintiffs' counsel memo [REDACTED]  
[REDACTED] Memo to client regarding  
same.

Numerous counsel and staff memos regarding 0.20 67.50 DBW  
attendance at GM corporate representative  
deposition and logistics for Delphi deposition  
of A. Curtis.

Memo from D. Weinstein concerning sending 0.50 168.75 KRW  
order denying Delphi's motion to dismiss from  
K. Smith matter to C. Haffey; correspondence  
sending order to C. Haffey as requested; memo  
to J. Derian concerning attending deposition of  
GM representative; memo to counsel for GM  
concerning whether deposition going forward  
of GM representative on August 31.

Aug-24-11 Review and respond to J. Derian memo 0.20 67.50 DBW  
regarding D. Nunan's advice to proceed with  
SDM download. Memo to attorney K. Worley

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September 12, 2011

regarding next steps. Memo to client.

Receipt and review of memo from J. Derian concerning SDM download; correspondence to counsel for GM concerning deposition of GM representative and proposed SDM download.

0.20

67.50

KRW

Aug-25-11

Memo from D. Weinstein concerning future action items to obtain SDM download; return memo concerning same; review additional memos from D. Weinstein concerning future action items for obtaining download of SDM; return memo concerning same; memo to J. Derian concerning scheduling depositions of plaintiffs Vladimir and Aleksandr Averbukh; memo from counsel for GM concerning deposition of GM representative cancelled due to trial setting; return memo concerning same; memo from J. Derian concerning scheduling deposition of plaintiffs; coordination of conference with counsel for GM concerning EDR download; memo to J. Derian concerning postponing deposition of GM representative.

0.70

236.25

KRW

Aug-26-11

Send memo to plaintiffs' attorney rejecting \$900K demand. Review reply to same and send to client.

0.10

33.75

DBW

Conference with counsel for GM concerning GM representative deposition being postponed, proposed SDM download, and

0.50

168.75

KRW

Review file and draft checklist of future action items.

0.20

67.50

KRW

Aug-29-11

Meeting with attorney K. Worley regarding A. Curtis deposition arrangements and strategy. Conference with A. Curtis regarding deposition scope, preparation and arrangements. Client memo regarding same.

0.80

270.00

DBW

Conference with D. Weinstein concerning preparation of A. Curtis for deposition on 9/27; memo to file concerning settlement credit and non-economic damages cap information received from local counsel.

0.50

168.75

KRW

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Aug-30-11	Correspondence to counsel for GM/Enterprise concerning status of obtaining information from counsel for Siemens to download SDM in subject vehicle.	0.20	67.50	KRW
Aug-31-11	Review Butzel Long bankruptcy dismissal motion package sent from J. Derian. Memo back regarding possible waiver issue. Staff notes and file note regarding same. More memos with J. Derian regarding same, and draft proposed letter to plaintiffs' counsel regarding non-waiver by Delphi.	0.60	202.50	DBW
	Receipt and review of bankruptcy dismissal motion from J. Derian.	0.30	101.25	KRW
<b>Unadjusted Balance (UB)</b>		<b>47.80</b>	<b>\$15,801.75</b>	

**Balance Due (90% of UB per agreement) \*** **\$14,221.58**

\*Amount claimed in Motion does not reflect adjustment because 10% difference was paid on later invoice.

**DISBURSEMENTS**

Aug-03-11	Professional services rendered by Bacon, Thornton & Palmer, L.L.P.	322.33	/
Aug-15-11	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Taxis to and from deposition location	70.40	/
	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Taxi from Hobby Airport to Home	20.00	/
	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Meals	35.00	/
	K. Worley travel to Baltimore, MD to attend deposition of plaintiff Alla Averbukh - Airfare	639.90	/
Aug-26-11	Professional services rendered by LegalLink, Inc. - Witness Alla Averbukh	436.75	/
<b>Totals</b>		<b>\$1,524.38</b>	

**Total Fee & Disbursements** **\$15,745.96**

Total amount claimed in Motion after disregarding 10% adjustment

TAX ID Number 26-2022982 and \$322.33 Bacon invoice: \$17,003.80

Mr. James G. Derian

<b>Name</b>	<b>TIMEKEEPER SUMMARY</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
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September 12, 2011

David B. Weinstein

5.00

\$337.50

\$1,687.50

Katheryne Worley

41.30

\$337.50

\$13,938.75

Maggie Peroni

1.50

\$117.00

\$175.50

5,624.25

See will  
DPH

**WEINSTEIN TIPPETTS & LITTLE LLP**

7660 Woodway, Suite 500  
Houston, TX 77063

Ph: (713) 244-0800

Fax: (713) 244-0801

Mr. James G. Derian

October 10, 2011

Delphi Corporation  
5825 Delphi Drive, M/C 483-400-554  
Troy, MI  
48098-2815

File #: 2012

ATTN: Mr. James G. Derian

**Final Bill**

Inv #: 2790

RE: Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,  
et al.

**FOR PROFESSIONAL SERVICES RENDERED**

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Sep-01-11	Draft letter to B. Kuhlman concerning stay of discovery while bankruptcy motion is pending; memo to D. Weinstein concerning same; memo to D. Weinstein concerning document production in light of proposed discovery stay.	0.50	168.75	KRW
Sep-02-11	Memos and coordination concerning seeking stay of discovery from counsel for plaintiffs during pendency of bankruptcy dismissal motion; coordination concerning correspondence to plaintiffs' counsel.	0.30	101.25	KRW
Sep-07-11	Memos with A. Curtis regarding plans for deposition preparation week of 9/19/11.	0.20	67.50	DBW
	Conference with attorney K. Worley regarding plans for A. Curtis deposition preparation and strategy in light of plaintiffs' refusal to agree to discovery abatement in light of bankruptcy dismissal motion. Client memo regarding same.	0.30	101.25	DBW
	Memo to D. Weinstein concerning proposed stipulation for EDR download, bankruptcy stay, and additional future action items; memo to local counsel concerning status of motion	0.60	202.50	KRW

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October 10, 2011

for non-sharing protective order; memo to local counsel concerning due date for plaintiffs' response to motion for non-sharing protective order; conference with D. Weinstein concerning proposed stipulation for EDR download, proposing stipulation on discovery done under protest, and future action items.

Sep-08-11	Coordination concerning deposition preparation for deposition of A. Curtis; memo to counsel for GM/Enterprise concerning stipulation for EDR download.	0.50	168.75	KRW
Sep-09-11	Memos with attorney K. Worley regarding preparation for A. Curtis deposition and entry of client's proposed protective order. Review and edit draft stipulation regarding Delphi not waiving bankruptcy dismissal motion by participating in discovery here.	0.40	135.00	DBW
	Correspondence to counsel for plaintiffs concerning downloading EDR module; draft stipulation concerning discovery stay; draft amended certificate of service for motion for non-sharing protective order; conference with D. Weinstein concerning same; conference with local counsel concerning same; receipt and review of memo from J. Derian concerning stipulation for discovery stay.	3.40	1,147.50	KRW
Sep-12-11	Receipt and review of memo from plaintiffs' counsel concerning scheduling deposition of GM representative on 9/22; memo to D. Weinstein concerning same; memo exchange with D. Weinstein concerning multiple scheduling matters.	0.20	67.50	KRW
	Conference with attorney Worley; compile documents produced by Delphi for inclusion in notebook for use at A. Curtis' deposition preparation meeting.	0.40	46.80	MPP
Sep-13-11	Memos with client and attorney K. Worley regarding attendance at proposed GM corporate representative deposition 9/22.	0.30	101.25	DBW
	Memo from D. Weinstein concerning scheduling deposition of GM representative.	0.20	67.50	KRW
	Compile documents and prepare binders	1.90	222.30	MPP

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of voluminous documents produced for attorney use; create detailed index.

Sep-14-11	Counsel and client memos regarding September 22 GM corporate representative deposition arrangements.	0.10	33.75	DBW
	Memo from D. Weinstein concerning D. Tippetts attending deposition of GM corporate representative on 9/22; memo to all counsel concerning availability to attend deposition on 9/22 of GM representative.	0.30	101.25	KRW
	Conference with D. Tippetts concerning deposition of GM representative.	0.20	67.50	KRW
Sep-15-11	Coordination and multiple conferences regarding deposition of GM representative on air bag sensor recording and storage topics; review multiple memos regarding above; coordination regarding preparation for above deposition.	0.30	101.25	DBW
	Conference with A. Curtis concerning materials prepared for deposition preparation and status of supplemental document production; review document production correspondence to finalize materials for deposition preparation on 9/20 and coordinate sending to A. Curtis; conference with counsel for GM concerning deposition of GM representative; memo to D. Tippetts and D. Weinstein concerning re-scheduling the deposition of GM corporate representative; memo from counsel for GM concerning same; memo to D. Weinstein concerning available for deposition of GM representative as proposed on 9/28; memo to counsel for GM concerning same.	1.30	438.75	KRW
	Memos and coordination concerning finalizing notebooks to send to A. Curtis for Averbukh deposition preparation.	0.20	67.50	KRW
	Conferences, memos, and coordination with M. Peroni concerning documents produced and preparing materials for deposition preparation; conference with D. Weinstein concerning same.	0.60	202.50	KRW

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	Review list of documents produced and determine corresponding response to request for production; prepare index regarding same.	1.60	187.20	MPP
Sep-16-11	Conference with D. Weinstein concerning deposition of GM representative; arrangements for attending deposition preparation of A. Curtis on 9/20-9/21; memo to B. Frantangelo concerning producing EOL test data in color.	0.50	168.75	KRW
	Prepare boxes of documents and forward to A. Curtis in advance of deposition preparation meeting.	0.50	58.50	MPP
	Prepare notebook of discovery responses for attorney Weinstein and Worley's deposition preparation meeting with A. Curtis.	1.20	140.40	MPP
Sep-18-11	Staff and counsel memos regarding arrangements for deposition of Delphi's A. Curtis. Memos with attorney K. Worley and A. Curtis regarding preparation session scheduling and deposition scheduling.	0.40	135.00	DBW
Sep-19-11	Counsel memos regarding start time and arrangements for GM corporate representative deposition 10/6/11. Meeting with attorney K. Worley regarding agenda for deposition preparation of A. Curtis and strategy for same.	0.70	236.25	DBW
	Detailed file review and preparation of agenda and notes in advance of deposition preparation of Delphi engineer A. Curtis.	4.50	1,518.75	DBW
	Memos and coordination concerning attending deposition of A. Curtis on 9/27 in Indianapolis, Indiana; conference with D. Weinstein concerning preparation of A. Curtis for deposition.	0.40	135.00	KRW
Sep-20-11	Deposition preparation in Kokomo with Delphi engineer A. Curtis and attorney K. Worley, and meeting with Delphi engineer D. Nunan regarding SDM download and evaluation from vehicle inspection. File notes regarding same. Client memo regarding same.	8.00	2,700.00	DBW
	Review documents produced in discovery for use in preparing A. Curtis for deposition scheduled on 9/27; all-day preparation session with A. Curtis for scheduled deposition on	8.00	N/C	KRW

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9/27; review discovery responses to identify potential lines of questioning for deposition of A. Curtis; discuss potential questioning and strategy for deposition of A. Curtis; conferences with D. Weinstein concerning future strategy for deposition of A. Curtis and deposition of GM representative scheduled on October 6.

Sep-21-11	Second deposition preparation session in Kokomo with Delphi engineer A. Curtis and attorney K. Worley. File notes and client memo regarding same. Staff and client reports regarding same.	8.00	2,700.00	DBW
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	Preparation session of A. Curtis for deposition scheduled on 9/27; memos and coordination concerning production of End of Line testing data; draft checklist of future action items for supplementing discovery and obtaining non-sharing agreements prior to deposition of A. Curtis; receipt and conduct brief review of opposition to Delphi's bankruptcy dismissal motion; conference with D. Weinstein concerning same.	8.00	N/C	KRW
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Sep-22-11	Conference with client regarding plans for A. Curtis deposition preparation and deposition on 9/27/11.	0.20	67.50	DBW
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	Conference with J. Derian regarding outcome of bankruptcy court hearing today on motion to dismiss and ramifications of same.	0.30	101.25	DBW
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	Conference with counsel for Alla Averbukh concerning signing confidentiality protective order prior to deposition of A. Curtis on 9/27; receipt and review of amended notice of deposition of GM representative; memo to J. Derian sending notice of deposition; conference with counsel for GM concerning case status and future action items; draft correspondence to counsel for Alla Averbukh concerning signing confidentiality agreement; review plaintiffs' response to Delphi's motion for non-sharing protective order; conference with D. Weinstein concerning dismissal of lawsuit following grant of bankruptcy dismissal motion; memo from J. Derian concerning same; conference with M. Peroni	2.20	742.50	KRW
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Invoice #: 2790 Page 6 October 10, 2011

	concerning production of end of line test data; memo to D. Weinstein concerning same.			
	Prepare supplemental responses to request for production 59; prepare for service.	0.60	70.20	MPP
Sep-23-11	Review plaintiffs' memo canceling A. Curtis deposition. Meeting with attorney K. Worley regarding effect of same and next steps. Review attorney Haffey memo regarding speaking today regarding bankruptcy order effect.	0.30	101.25	DBW
	Conference call with bankruptcy counsel and client regarding details of hearing yesterday resulting in court order to dismiss Maryland action. Further conference with client regarding same. Draft proposed email to plaintiffs' counsel and send to J. Derian for review and comment.	0.70	236.25	DBW
	Memo to expert J. Pearson regarding dismissal status. Staff memos and file notes regarding same.	0.10	33.75	DBW
	Memo to J. Derian and A. Curtis sending notice of cancellation of deposition of A. Curtis received from counsel for plaintiffs' office; conference with D. Unrue, C. Haffey, J. Derian, and D. Weinstein concerning hearing on bankruptcy dismissal motion and discussing future action items for wrapping case up.	1.00	337.50	KRW
Sep-26-11	Counsel memos regarding bankruptcy dismissal order and effect on Delphi discovery obligations. Initial receipt and review of bankruptcy hearing transcript. Client memos regarding same. Review GM counsel letter to plaintiffs regarding supplying GM documents. Client memo regarding no need for same in light of bankruptcy rulings.	0.40	135.00	DBW
	Memo to counsel for GM/Enterprise concerning bankruptcy dismissal and cancellation of deposition of A. Curtis.	0.20	67.50	KRW
Sep-28-11	Review and respond to attorney K. Worley memo regarding GM request for documents produced to plaintiffs before bankruptcy ruling last week.	0.10	33.75	DBW

Invoice # 2790 Page 7 October 10, 2011

Memo from counsel for GM concerning supplemental document production; memo to D. Weinstein concerning same; draft return memo concerning same.	0.20	67.50	KRW
Prepare and forward Delphi document 003699 to GM counsel.	0.20	23.40	MPP
<b>Totals</b>	<b>60.50</b>	<b>\$13,607.55</b>	

**DISBURSEMENTS**

Sep-16-11	Digital prints by Copy Source One Ltd. - 3,698 digital blowbacks from CD	369.80	✓
Sep-19-11	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Hotel 239.41 (150.93 + 88.48)	239.41	✓
	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Rental Car	246.42	✓
	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Meals	17.33	✓
	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Airport Parking	37.00	✓
	D. Weinstein travel to Kokomo, IN for deposition preparation of Delphi Engineer Andrew Curtis - Airfare	691.90	✓
<b>Totals</b>		<b>\$1,601.86</b>	

**Total Fee & Disbursements** **\$15,209.41**

**Overpayment by Sedgwick on Invoice 2653** **- 54.00**

**\$15,155.41** \*\*

**Balance Due (10% deferred per incentive fee agreement) \*** **+11,770.92**

**TOTAL DUE:** **\$26,926.33**

\*This payment is larger than the payment claimed in the Motion because it constitutes repayment of the 10% reductions applied on not only the invoices at issue in this Motion, but also earlier invoices.

TAX ID Number 26-2022982

Mr. James G. Derian

Accordingly, for purposes of the Motion, the 10% deferred payment on each invoice was simply

disregarded so that the actual amounts the Reorganized

Debtors ultimately paid on account of each invoice is properly reflected.

\*\*This is the total amount claimed in the Motion.



Invoice #:	2790	Page 8	October 10, 2011	
Name	TIMEKEEPER SUMMARY	Hours	Rate	Amount
David B. Weinstein		25.30	\$337.50	\$8,538.75
Katheryne R. Worley		12.80	\$337.50	\$4,320.00
Katheryne R. Worley		16.00	\$ 00.00	No Charge
Maggie P. Peroni		6.40	\$117.00	\$ 748.80

Sedgwick  
DPH

**WEINSTEIN TIPPETTS & LITTLE LLP**  
7660 Woodway, Suite 500  
Houston, TX 77063

Ph: (713) 244-0800

Fax: (713) 244-0801

Mr. James Derian

November 3, 2011

Delphi Corporation

5825 Delphi Drive, M/C 483-400-554

Troy, MI

48098-2815

File #: 2012

ATTN: Mr. James Derian

Inv #: 2856

RE: Vladimir Averbukh, et al. v. Delphi Holdings Corp. and DPH-DAS LLC,  
et al.

**FOR PROFESSIONAL SERVICES RENDERED**

DATE	DESCRIPTION	HOURS	AMOUNT	TIMEKEEPER
Oct-03-11	Memos with J. Derian confirming no Delphi attendance at GM corporate representative deposition October 6. Conference with attorney K. Worley regarding same. Draft proposed memo to all counsel regarding Delphi not appearing at October 6 GM deposition and send to client for approval and comment.	0.40	135.00	DBW
	Memo to counsel for A. Averbukh concerning signing protective order in advance of deposition of GM representative.	0.20	67.50	KRW
Oct-04-11	Finalize and send email to all counsel regarding Delphi not appearing at GM deposition and restrictions on use of Delphi confidential documents. Client and staff memos regarding same. Review Butzel Long proposed order on bankruptcy dismissal rulings.	0.40	135.00	DBW
Oct-05-11	Review and respond to attorney K. Worley memo regarding failure of Alla Averbukh counsel to sign confidentiality agreement in advance of GM corporate representative deposition.	0.10	33.75	DBW

Invoice #:	2856	Page 2	November 3, 2011	
	Conference with counsel for defendant A. Averbukh concerning protective order issues; draft correspondence to counsel for plaintiff A. Averbukh concerning same.	0.50	168.75	KRW
Oct-06-11	Review plaintiffs' proposed motion for dismissal. Memos with attorney K. Worley regarding insuring same complies with local practice.	0.20	67.50	DBW
	Receipt and review of proposed dismissal stipulation from counsel for plaintiffs; memo to D. Weinstein concerning strategy for obtaining dismissal.	0.20	67.50	KRW
Oct-07-11	Conference with counsel for A. Averbukh concerning protective order matters; receipt and review of memo from local counsel concerning proposed dismissal from plaintiffs; review/revise dismissal and return to local counsel; memo from local counsel concerning same; memo to J. Derian sending draft stipulation of dismissal.	1.00	337.50	KRW
Oct-10-11	Review bankruptcy judge's 10/4/11 order of dismissal. Client memo regarding same.	0.10	33.75	DBW
	Receipt and review of correspondence from J. Derian approving red-lined stipulated dismissal; memo to counsel for plaintiffs sending revised stipulated dismissal.	0.20	67.50	KRW
Oct-11-11	Memo to local counsel concerning obtaining dismissal stipulation for plaintiff A. Averbukh.	0.20	67.50	KRW
Oct-14-11	Memo to D. Weinstein concerning status of dismissal stipulation; conference with D. Weinstein concerning same.	0.20	67.50	KRW
Oct-17-11	Correspondence to local counsel concerning dismissal stipulation proposed by Averbukh plaintiffs.	0.20	67.50	KRW
Oct-18-11	Receipt and review of memo from local counsel concerning plaintiff A. Averbukh's claims in lawsuit and plaintiffs' proposed dismissal stipulation; return memo sending original complaint for use in finalizing stipulation of dismissal; memo to plaintiffs' counsel concerning dismissal stipulation.	0.60	202.50	KRW

Invoice #: 2856 Page 3 November 3, 2011

Oct-19-11	Correspondence to counsel for plaintiffs concerning issues with dismissal stipulation.	0.10	33.75	KRW
Oct-24-11	Conference with J. Derian concerning status of dismissal order; return memos concerning same.	0.20	67.50	KRW
Oct-25-11	Review client memos regarding need to understand plaintiffs' counsel refusal to include A. Averbukh on dismissal stipulation. Conference with J. Derian regarding same. Conference with attorney K. Worley regarding same. Conference with A. Averbukh personal counsel K. Mallahan regarding same. Memo to all counsel regarding need to finalize dismissal and requesting plaintiffs' clarification on refusal to include A. Averbukh. Numerous further memos with counsel regarding separate dismissal stipulations agreed to for A. Averbukh and other family members. Client reports regarding same.	0.80	270.00	DBW
	Further memos and replies with plaintiffs' counsel regarding A. Averbukh inclusion on stipulated dismissal. Client memos regarding same.	0.40	135.00	DBW
Oct-28-11	Receipt of and coordination regarding forwarding plaintiff's signed stipulation of dismissal to attorneys Weinstein and Worley for further handling.	0.10	11.70	MPP
Oct-30-11	Memo to D. Weinstein concerning obtaining non-sharing agreement from A. Averbukh's attorneys prior to deposition of GM representative.	0.20	67.50	KRW
Oct-31-11	Review revised dismissal stipulation sent from A. Averbukh's personal attorney. Memos with counsel regarding acceptability of same.	0.10	33.75	DBW
	Totals	6.40	\$2,137.95	

#### DISBURSEMENTS

Sep-02-11	Professional services rendered by Bacon, Thornton & Palmer, L.L.P.	647.42
Sep-22-11	FedEx Delivery 09/19/11 A. Curtis - Delphi Electronics & Safety	105.23

Invoice #: 2856

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November 3, 2011

	FedEx Delivery 09/16/11 A. Curtis - Delphi Electronics & Safety	186.50
Oct-06-11	Professional services rendered by Bacon, Thornton & Palmer, L.L.P.	237.58 ✓

Totals	\$1,176.73
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Total Fee & Disbursements *	\$3,314.68
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TAX ID Number 26-2022982

Mr. James Derian

Name	TIMEKEEPER SUMMARY	Hours	Rate	Amount
David B. Weinstein		2.50	\$337.50	\$843.75
Katheryne Worley		3.80	\$337.50	\$1,282.50
Maggie Peroni		0.10	\$117.00	\$11.70

Total amount claimed in Motion after subtracting \$885 for Bacon invoices:  
\$2,429.68